

FACTS

5. Defendant, Christine D. Ogden admits the allegations contained in Paragraph 5 of Plaintiff's Complaint.

6. Defendant, Christine D. Ogden admits the allegations contained in Paragraph 6 of Plaintiff's Complaint.

7. Defendant, Christine D. Ogden admits the allegations contained in Paragraph 7 of Plaintiff's Complaint.

8. Defendant, Christine D. Ogden is without sufficient information to form a response to the allegations contained in Paragraph 8 of Plaintiff's Complaint and therefore denies any and all allegations contained therein.

9. Defendant, Christine D. Ogden is without sufficient information to form a response to the allegations contained in Paragraph 9 of Plaintiff's Complaint and therefore denies any and all allegations contained therein.

10. Defendant, Christine D. Ogden is without sufficient information to form a response to the allegations contained in Paragraph 10 of Plaintiff's Complaint and therefore denies any and all allegations contained therein.

11. Defendant, Christine D. Ogden is without sufficient information to form a response to the allegations contained in Paragraph 11 of Plaintiff's Complaint and therefore denies any and all allegations contained therein.

12. Defendant, Christine D. Ogden is without sufficient information to form a response to the allegations contained in Paragraph 12 of Plaintiff's Complaint and therefore denies any and all allegations contained therein.

13. Defendant, Christine D. Ogden is without sufficient information to form a response to the allegations contained in Paragraph 13 of Plaintiff's Complaint and therefore denies any and all allegations contained therein.

14. Defendant, Christine D. Ogden admits the allegations contained in Paragraph 14 of Plaintiff's Complaint.

15. Defendant, Christine D. Ogden is without sufficient information to form a response to the allegations contained in Paragraph 15 of Plaintiff's Complaint and therefore denies any and all allegations contained therein.

ADDITIONAL AND/OR AFFIRMATIVE DEFENSES

A. “The United States Department of Agriculture” is not the real party in interest and has no standing to maintain this action as the promissory note is payable to “the United States of America” and the grantee and owner of the mortgage for which foreclosure is sought is “the United States of America.””

B. The complaint fails to state a claim upon which relief can be granted because Plaintiff failed to comply with the provisions of 14 M.R.S. § 6111.

C. Plaintiff has waived its rights of foreclosure under the mortgage it seeks to foreclose.

D. Plaintiff’s claims are barred by the doctrine of equitable estoppel.

E. Plaintiff’s claims are barred due to the laches of Plaintiff in the enforcement of its rights under the mortgage.

F. Plaintiff’s claims are barred by the doctrine of unclean hands due to the conduct of the Plaintiff in its dealings with Defendant and the mortgaged property in connection with the mortgage.

WHEREFORE, Defendant, Christine D. Ogden prays this Honorable Court will dismiss Plaintiffs’ Complaint and for her costs.

Dated at Belfast, Maine this 9th day of June, 2025

/s/ Jeremy M. Marden, Esq.
Jeremy M. Marden, Esq.
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CERTIFICATE OF SERVICE

I, Jeremy M. Marden, Esquire, Attorney for Defendant, Christine D. Ogden, certify that service has been made of the foregoing Answer to Plaintiff's Complaint for Foreclosure to the Plaintiff by e-mailing a conformed copy of said Answer to Kevin J. Crosman, Esq. by e-mail only to: kcrossman@jensenbaird.com on June 9, 2025.

/s/ Jeremy M. Marden, Esq.
Jeremy M. Marden, Esq.